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Alliance OF AUTOMOBILE MANUFACTURERS

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May 25, 2004

Mr. Noble N. Bowie
Associate Administrator for
Planning, Evaluation and Budget
National Highway Traffic Safety Administration
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, DC 20590

Dear Mr. Bowie:

Subject: Docket No. NHTSA-2004-16932; Plan for Evaluating the Effectiveness of Vehicle and Behavioral Programs, Calendar Years 2004 - 2007

The Alliance of Automobile Manufacturers (the Alliance) is pleased to provide comments on NHTSA's Evaluation Program Plan for Calendar Years 2004-2007. The Alliance is a trade association of nine automobile manufacturers including BMW Group, DaimlerChrysler, Ford Motor Company, General Motors, Mazda, Mitsubishi Motors, Porsche, Toyota, and Volkswagen.

The Alliance strongly supports NHTSA's efforts to regularly evaluate its programs for efficacy. A regular, systematic review of programs and their effectiveness is key to ensuring that NHTSA's programs accomplish their goals for improving real-world safety and offers an opportunity to amend programs, when necessary, to achieve greater safety gains or to achieve comparable safety benefits at a lower cost to society. In particular, the Alliance supports NHTSA's plans to evaluate many of its behavioral safety programs. Behavioral safety programs are NHTSA's most cost-effective initiatives, and help ensure that consumers get the most benefit from the safety technologies auto manufacturers install in their vehicles. Evaluating these programs, and making improvements to them based on the results of the evaluations, provides an opportunity for substantial safety benefits.

The Alliance also supports NHTSA's plans for a broad-based look at the costs and benefits of its safety standards and vehicle safety technologies. NHTSA's plans to study the costs of its safety standards from 1968-2002 and the lives saved by vehicle safety equipment from 1960-2002 provide an opportunity for the agency to assess the effectiveness of its vehicle standards program as a whole and lay the foundation for more detailed assessments of the effectiveness of individual Federal Motor Vehicle Safety

Standards. We suggest, however, that these two evaluations cover identical time frames, rather than one starting with 1960 and the other starting with 1968, so that their results can be compared. We also suggest that NHTSA seriously consider a similarly-broad-based review of its entire range of behavioral safety programs, so that their historic overall effectiveness can be appropriately compared with the vehicle standards program.

NHTSA's evaluation plan lists a number of potential evaluations that the agency has not formally scheduled, but indicates are a "lower priority, but depending on circumstances might supplement or replace some projects in the first group." The Alliance recommends that several of these potential evaluations should be moved up to the scheduled group. In particular, three behavioral program reviews (Safety belt programs targeting youth, Factors that encourage/discourage States from enacting primary belt laws, and Safety belt initiatives for diverse/high-risk populations) can assess the efficacy of key existing NHTSA programs to increase safety belt use. Since increasing belt use is the single most effective item available to reduce highway injuries and fatalities, the agency should thoroughly evaluate each of its belt use programs to ensure it is using the best means to raise U.S. safety belt use rates.

The Alliance also suggests that NHTSA consider formally scheduling several potential vehicle program evaluations. These are the New Car Assessment Program (NCAP) follow-up evaluation, the light vehicle anti-lock brake system (ABS) follow-up evaluation, the automatic door locks evaluation, and the evaluation of the correlation of Thor-Lx/HIII responses on NCAP and lower extremity injury in crashes. As NHTSA points out in its Evaluation Plan, its previous frontal NCAP review was performed in 1994, using data for model years 1979-91 passenger cars, with only 5 percent of the cars in that data base being equipped with air bags and without any light trucks. With strong consumer demand for light trucks, the substantially increased number of vehicles with air bags, widespread media and public attention to NCAP results, more vehicle manufacturers advertising NCAP results, and with the potential legislation (S.2026) to require new vehicles to be labeled with available NCAP test results, a thorough review of any relationship between frontal NCAP test results and real-world safety experience is imperative. Anti-lock brakes are still standard or optional equipment on most cars and light trucks. A review of more recent field data, reflecting any changes in anti-lock brake design and consumer education on the proper use of ABS, may explain or change earlier study conclusions about the net real-world effectiveness of this safety technology. As auto manufacturers expand the use of automatic door locks in their vehicles, an assessment of the safety benefits of this technology is important, in considering the broad safety goal of reducing occupant ejections in crashes and the narrower issue of NHTSA's impending proposed upgrade of FMVSS 214. And, finally, as NHTSA has recently published (69 FR 5108) a request for comment on the possibility of the agency proposing a high-speed frontal offset crash test requirement, an understanding of the relationship between the test dummy performance and real-world injury results should be an extremely important element in NHTSA's future decisionmaking on this subject.

However, the Alliance does not support NHTSA's potential evaluation on the "relationship between vehicle type and aggressive driving." We firmly believe that the type of vehicle selected by a driver does not influence significantly whether that driver is "aggressive" or not. In addition because it typically is not possible to truly control for driver demographic variables in performing such an evaluation, the results would almost certainly be misleading.

We suggest that NHTSA consider performing an evaluation of FMVSS 118 (power-operated window, partition, and roof panel systems) in the 2004-2007 time frame. NHTSA has not performed an evaluation of this standard in the past, and does not propose to perform such an evaluation in this document. Yet there are a number of new proposals related to this standard from Congress and the advocacy community. This is a standard NHTSA could consider for evaluation in the near term.

In a number of cases the Alliance suggests NHTSA should change the methodologies it proposes to use in its evaluations, to make them more balanced and complete. For example, NHTSA is proposing in 2005 to begin an evaluation of "glare problems with LTV headlamps and auxiliary lamps." There is no indication that the agency plans to look at the benefits of lighting systems used in LTVs – the agency appears to be entering this evaluation with a bias towards its results. As another example, there is no indication from NHTSA's plan that its proposed Early Warning Reporting system evaluation will try to determine its real-world safety benefits – the focus appears to be limited to the potential effect on increasing recalls. NHTSA plans an evaluation starting in 2006 on "integrated safety belts." However, the agency appears to be focusing solely on the potential benefits of these systems, without evaluating their costs. Finally, NHTSA's proposed analysis of electronic stability control systems is limited to single-vehicle crashes. However, NHTSA should also look to see whether there are reductions in multi-vehicle crashes, or reduced crash severity.

Finally, NHTSA should add to its Evaluation Plan examples of how its evaluations have been, and are going to be, used to change NHTSA's programs and standards. Performing these evaluations certainly is laudable. However, there needs to be a clear linkage between these program evaluations and subsequent changes in the agency's standards and programs, reflecting the lessons learned from the evaluations. In its Evaluation Plan, NHTSA should outline how it intends to link its evaluations to subsequent modifications to the agency's programs and standards to improve their efficacy, or to even consider dropping standards and programs if shown by evaluations to be ineffective.

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Thank you for this opportunity to offer our thoughts on the agency's Evaluation Plan. As noted above, we strongly support the concept of agencies performing evaluations of their programs. We are pleased that NHTSA is planning a wide-ranging and thorough look at many of its key programs over the next few years.

Sincerely,

Robert Strassburger
Vice President, Safety and Harmonization
Alliance of Automobile Manufacturers, Inc.

cc: Docket Management System Docket No. NHTSA-2004-16932 (2 copies)
Charles J. Kahane, NPO-321, NHTSA